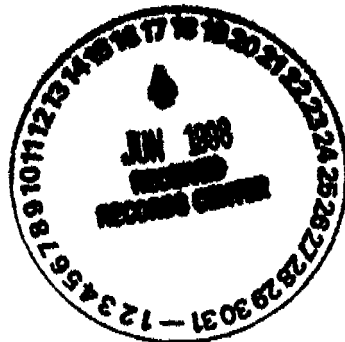




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INTEROFFICE MEMORANDUM

DATE: April 1, 1997
TO: K. A. Dorr, K-H ERWM&I Operations, T130F, X6043
FROM: S. M. Nesta, C&PA, National Environmental Policy Act, T130C, X6386 *SM Nesta*
SUBJECT: ADDITIONAL COMPLIANCE CONCERNS FOR DEMOLITION OF
BUILDINGS 980, 968 AND 965 - SMN-076-97

On March 19, I sent you a letter concerning National Environmental Policy Act documentation for the subject project, saying that the Proposed Action Memorandum (PAM) for the project needs to include certain wording by reference from the *Decommissioning Program Plan*. In the course of review by Kaiser-Hill's Compliance and Performance Assurance Group, additional concerns have arisen.

One is the potential for PCBs in or on parts of the buildings and equipment. The concern arises from the fact that PCBs, in addition to their well-known use in electric transformers, were also used in paint, electrical components, adhesives and soft rubber items and other material. The environmental checklist submitted for this project was ambivalent with regard to the potential for generating Toxic Substances Control Act (TSCA)-regulated wastes (such as PCBs) as well as several other types of waste. Therefore, in addition to the wording given in my March 19 letter, the Proposed Action Memorandum for the project also needs to state that:

All equipment and building materials will be surveyed and characterized for the presence of hazardous or radioactive contaminants, including those regulated by TSCA, and handled, stored and disposed of accordingly.

The second is that there appears to be a potential for release to the atmosphere of hazardous or radioactive air pollutants. I attach a letter from Air Quality Management describing some of the air quality regulations that may apply to your project and which you should be aware of in demolishing the buildings. It is project management's responsibility to ensure that all relevant regulations are complied with.

If you have any questions or need further information about NEPA compliance, please do not hesitate to contact me at X6386 or Bill Moore of Labat Anderson/NEPA at X8132. Any questions regarding TSCA compliance should be addressed to Greg Sollner at X3541 and for issues concerning possible air quality matters, call Carol Patnoe at X2440.

Attachments: As Stated

cc:

K. North, K-H
P. F. Ervin, K-H
G. R. Sollner, K-H
C. A. Patnoe, K-H

ADMIN RECORD
B980-A-00013



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INTEROFFICE MEMORANDUM

DATE: March 25, 1997

TO: Bill Moore, NEPA/Labat Anderson, T130C, X8132

FROM: *Carol D. Pata*
Carol Pata, Air Quality Management, T130C, X2440

SUBJECT: AIR QUALITY REVIEW OF PROJECT TO DECOMMISSION BUILDINGS 980, 968, AND 965 - CAP-048-97

Ref: S. M. Nesta letter # SMN-058-97 to distribution, entitled "Review of Project to Decommission Buildings 980, 968 and 965", and attached NEPA checklist

The project to decommission Buildings 980, 968 and 965 has been reviewed with respect to air quality impacts and compliance. Air Quality Management/Radian Corporation reviewed the project information provided in the above referenced letter and attached NEPA checklist and determined that there is a potential for emissions of regulated air pollutants. Although this project will not generate sufficient air emissions to trip air pollutant emission notice (APEN) or air permitting requirements, other air regulatory requirements will apply to the project. Please provide this information to the appropriate project manager.

Air Regulatory Requirements

Colorado Air Quality Control Commission Regulation No. 1 (CAQCC Reg. 1) regulates particulates, smoke, carbon monoxide and sulfur oxides.

- Reg. 1, Section II. A. 1 (smoke and opacity) will apply to any non-electric compressors, pumps or generators used in conjunction with the project. Emissions from the compressors, pumps or generators cannot exceed 20% opacity. Air Quality Management (AQM) must be notified if non-electric compressors, pumps and/or generators are used in conjunction with the project.
- Reg. 1, Section III. D. 2(h) (fugitive particulate emissions from demolition activities) applies to demolition projects. It requires that a control plan be developed that utilizes all available practical methods that are technologically feasible and economically reasonable to minimize fugitive dust emissions during the demolition of the buildings.

CAQCC Reg. 3 regulates non-radionuclide air pollutant emissions for all Colorado industries. The provisions of this regulation identify criteria air pollutants and hazardous air pollutants, establish air pollutant emission notice (APEN) thresholds for these regulated air pollutants, and set forth both construction and operating permit application guidelines. It appears that the decommissioning of Buildings 965, 968 and 980 will not generate regulated air pollutants in quantities sufficient to trip APEN or air permitting requirements.

CAQCC Reg. 7 regulates emissions of volatile organic compounds (VOCs).

- Reg. 7, Section III requires that transfers of VOC compounds to a tank with a capacity of 56 gallons or larger utilize bottom filling or submerged fill technology.
- Reg. 7, Section V requires that VOCs not be disposed of by evaporation or spillage.
- Reg. 7, Section VI requires that any rotating pump or compressor utilized to handle petroleum products be equipped with mechanical seals and packing glands.

CAQCC Reg. 8 regulates hazardous air pollutants. Reg. 8, Part B (Emission Standards For Asbestos) details the regulatory requirements for asbestos.

- Section II outlines certification and training requirements for asbestos abatement activities.
- Section III outlines notification requirements, standards for demolition projects, and requirements for storage and handling of asbestos waste. AQM must be provided with a copy of the notice of intent to conduct asbestos abatement or demolition that is submitted to the Colorado Department of Public Health and Environment, Air Pollution Control Division (CDPHE, APCD) for this project.

CAQCC Reg. 8, Part A, Subpart H (40 CFR Part 61, Subpart H) regulates radionuclide emissions other than radon from Department of Energy facilities.

- Section 61.92 requires that emissions of radionuclides to the ambient air from Department of Energy facilities shall not exceed those amounts that would cause any member of the public to receive in one year an effective dose equivalent (EDE) of 10 millirem. If radionuclide contamination is found in Buildings 965, 968, and/or 980, then AQM must be provided a copy of the contamination survey. The EDE from the project will be calculated and added to the Site radionuclide emissions total to prove compliance with the 10 millirem/year Site standard.

CAQCC Reg. 15 regulates emissions of ozone-depleting compounds (ODCs). Reg. 15 will apply to the project if any refrigeration system or appliance that contains a regulated ODC is disassembled or disposed of. All ODCs must be recovered by registered and certified technicians into an approved recovery vessel by an approved method prior to disassembly or disposal.

Air Quality Management should be informed of significant changes to the project parameters which could increase air pollutant emissions. Please contact Mike Putney of AQM/Radian Corporation at X2692 for any questions regarding this guidance.

MTP

cc:

M. Hyder (Radian)
S. Nesta (K-H)